

**Federal Defenders
OF NEW YORK, INC.**

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Southern District of New York
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August 8, 2022


Application GRANTED.

Via ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED.

Dated: New York, NY
08/09/2022


P. Kevin Castel
United States District Judge

**Re: United States v. Daniel Wellcome
22 Cr. 196 (PKC)**

Dear Judge Castel,

I write to respectfully request that the Court modify Mr. Wellcome's bail conditions to include travel for work to the District of Connecticut and the District of New Jersey.

Mr. Wellcome has been out on bail for 16 months, during which time his travel has been restricted to the Southern and Eastern Districts of New York. Recently, Mr. Wellcome has been offered construction jobs that would take him to the neighboring Districts of Connecticut and New Jersey.

I have spoken to Mr. Wellcome's supervising Pretrial Officer, Marnie Gerardino, and the Government, by Assistant United States Attorney Andrew Jones, who both have no objection to this request.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine
Attorney for Mr. Wellcome
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